



Jo Daviess Conservation Foundation
126 N. Main St., P.O. Box 210 • Elizabeth, IL 61028-0210

Board of Directors

President
Henry W. Wines
Vice President
Fred Borsdorf
Treasurer
Kathleen Harnett
Secretary
Marion Arnold
Directors
Dana Borsdorf
Steve Lofel
Susan Mould
Paul Maki
Julia Moore
Cliff Parsons
Larry Sanderson
Dana Wagner
Advisory Council
James Appleby
Susan Schuchman
John & Jean Redback
Warren
Belle & Lou Crane
Palmer
Allen & Barbara Hendrick
Apple River
Bill & Joanne McFadden
Apple River
Norman Temple
Lisa
David Wines
Susan
David Wines
Susan Mould
Susan Walker
Apple River
Susan Dick
Diane
Staff
Julie Bruster
Executive Director
Lori Proctor
Bobbie Brown
Administrative Assistant
815-458-9100
Fax 815-458-9102
E-mail info@jdcf.org
Website www.jdcf.org

July 18, 2003

Mr. Gregory L. Mounts, P.E.
Illinois Department of Transportation
Division of Highways—District 2
819 Depot Avenue
Dixon, IL 61021-3546

RE: Glacier Shadow Pass, U.S. Route 20 between Galena and Freeport

Dear Mr. Mounts:

The Board of Directors of the Jo Daviess Conservation Foundation requests that the current environmental impact statement (EIS) be revised to take into account the potential deleterious impact upon this region as a result of U.S. Route 20's recent designation as a NAFTA east-west trade corridor. The implications of U.S. Route 20 becoming a NAFTA truck route raise a number of serious environmental concerns that have yet to be addressed since the EIS was drafted and released prior to NAFTA's adoption by Congress. While designed to promote free trade, NAFTA is a transportation issue of enormous importance and must be evaluated in light of its potential adverse impact upon the beautiful Driftless Area of Illinois. This area, as you are probably aware, not only contains fragile and unique ecosystems, but attracts 1.5 million visitors each year due in part to its natural, unspoiled beauty.

Accordingly, we strongly oppose any commencement on a U.S. Route 20 freeway alternative, which will lead to a NAFTA highway through Jo Daviess County, until a new or revised EIS is properly formulated and a subsequent public hearing process completed.

We would appreciate an opportunity to meet with you or your representatives at your earliest convenience to discuss this issue further. I can be reached at 815-858-9100. Thank you for your prompt attention to this critical regional issue.

Sincerely,

Julie Bruster
Executive Director

cc: Timothy Martin
Donald Manzullo
Todd Sieben
Jim Sacia
Jim Gitz

The mission of the Jo Daviess Conservation Foundation is to protect the natural heritage, spectacular scenery, and agricultural character of the Jo Daviess County, Illinois, area.

149

While I have no immediate loss to this project except the closing of Route 78 North, I feel as a taxpayer and farmer that we need to avoid as much expense as possible, and maintain as much prime farmland as we can. It will be a large savings, both cost-wise and land-wise, to avoid the Alternate 78 Route, and utilize the existing infrastructure that is more than sufficient to handle a reduced traffic load. I consider myself a good friend and neighbor of both these outstanding multi-generational farm families, and dislike to see their land split up in such a needless way. Everyone involved realizes the need for a new highway, but we need to disrupt as little as possible for those who are making way for the project. Please feel free to contact me, and I would be more than willing to travel to Dixon to meet with you in person.

Sincerely,

John C. Curtiss
1330 South Curtiss Road
Stockton, IL 61085

815-947-4532
jcurtiss@blkhawk.net

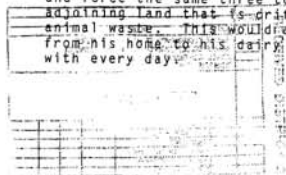
Mr. Greg Mounts
819 Depot Avenue
Dixon, IL 61021

Mr. Mounts,

I would like to take this opportunity to share a few thoughts with you after reviewing the new free-way alignments at your recent meeting. While a new four-lane highway would drastically improve safety and increase the economic viability of Northwest Illinois, I feel a few changes need to be made in the proposed alignment. My particular area of concern is with the Simmons Mound/Alternate 78 route.

While serving as secretary of the Agriculture Work Group during the initial public involvement study, one of our main priorities was to preserve as much "prime" farm ground as possible. The proposed route puts an on-off ramp on the William Borsdorf property, a complete interchange in the middle of the Gene Offenheiser property, and the need to purchase a thriving grocery store, auto-body shop, and a new family style duplex. While a few people will benefit from this route, too much money is being spent to acquire these properties. As disappointing as it would be to the Borsdorf family, it would seem much more cost-effective to avoid the alternate 78 route, place a full interchange on their property, and place the new four-lane straight through Offenheiser's property. This option would save a large expense of having to purchase two businesses and a home, consume much less land, keep the interchange in one spot, and utilize the existing infrastructure.

Additional concerns arise as the current 78 North would be closed. Our farm operation includes several hundred acres north of highway 20, and traveling to this land would now require a trip three to four miles in length. While inconvenient for myself, this plan would totally isolate William Borsdorf from his large dairy, and force the same three to four mile trip just to reach adjoining land that is critical for livestock feed and animal waste. This would make the eight to ten trips from his home to his dairy a daunting task to be faced with every day.



150



Illinois Department of Transportation

Division of Highways / District 2
819 Depot Avenue / Dixon, Illinois / 61021-3500
Telephone 815/284-2271

CITIZENS COMMENTS

FAP 301 (US 20)
SECTION 43-1-2-3-4-58177-1
JOB NO. P-92-004-02
JODAVIESS & STEPHENSON COUNTIES
GALENA TO FREEPORT EIS

The EIS is presented contains two obvious omissions. First - there is no mention of US 20's designation as part of the NAFTA Corridor, or any analysis of impacts on any fragile and beautiful environment by the increased traffic - most importantly, by polluting international trucks. Secondly - the route build alternative received no genuine consideration since it assumed only routine maintenance to present US 20 and failed to take into account improvements already being made and others (such as more passing lanes and shoulders along with bypasses around the curves) which could reasonably be expected to address safety needs while preserving the integrity of this area. A slickly produced animation looking at the road through motorists' eyes misses the point - that of Illinois the Driftless Area is unique. It's scenic beauty, geophysical features and plant/animal species deserve protection from Route 20's business interests no less than one of our beautiful National Parks.

PLEASE PRINT

NAME: BARBARA MATHL
ADDRESS: 1333 S. FURNS RD.
STOCKTON, IL 61085
PHONE:

I (Do ☒ Do Not ☐)
DESIRE A RESPONSE:
PLEASE SUBMIT WRITTEN
RESPONSE BY:

Your earliest convenience

151



Illinois Department of Transportation
Division of Highways / District 2
819 Depot Avenue / Dixon, Illinois / 61021-3500
Telephone 815/284-2271

CITIZENS COMMENTS

FAP 301 (US 20)
SECTION 43-1, -2, -3, -4, -5&177-1
JOB NO. P-92-004-92
JODAVIESS & STEPHENSON COUNTIES
GALENA TO FREEPORT EIS

In reviewing your DEIS presentation I am concerned that a little time was given to the other options and what adverse effect your recommended route will have on Jodavess County further north. This area is a jewel of the State of Illinois and should not be compromised for a main truck route when other locations are available. You would not have a freeway through other unique areas such as Yellowstone Park or Yosemite. If there is no other alternative but to go through the center of this county, the road should go as directly as possible from the desired highway northward of Galena directly to the nearest bypass. These comments are even more applicable since US 20 has been designated as NAFTA route.

PLEASE PRINT
NAME: FRED MEHL
ADDRESS: 1133 S. EVANS RD
STOCKTON, IL 61085
PHONE: (815) 862-3372

I (Do ☒ Do Not ☐
DESIRE A RESPONSE.
PLEASE SUBMIT WRITTEN
RESPONSE BY: ASAP

152

July 9, 2003

District Engineer
Illinois Department of Transportation
819 Department Avenue
Dixon, Illinois 61021

Re: Route 20

Dear District Engineer:

It is my strong belief that the proposed Longhollow alignment for a new Route 20, though better than the alternative routes proposed, represents huge negative environmental impact for beautiful Jo Daviess County and, therefore, should not be built at all.

Any expansion of Route 20 should be in the current roadbed or no expansion should be done at all. The ongoing improvements to "old" Route 20 have significantly improved safety and driveability and should be continued. An improved, current Route 20 would be most acceptable.

Should the Longhollow route be approved, however, it is critical that it not be opened for NAFTA traffic, which will have great negative impact on both the safety and environment of Jo Daviess County.

Sincerely,

Mary J. Moore
Mary J. Moore
270 Thunder Bay Road
Galena, Illinois 61036



Illinois Department of Transportation
Division of Highways / District 2
819 Depot Avenue / Dixon, Illinois / 61021-3500
Telephone 815/284-2271

CITIZENS COMMENTS

FAP 301 (US 20)
SECTION 43-1, -2, -3, -4, -5&177-1
JOB NO. P-92-004-92
JODAVIESS & STEPHENSON COUNTIES
GALENA TO FREEPORT EIS

Jul, 17, 03

To District Engineer:
I was to your public hearing, held at Highland College on the 25th of June of this year. My main concern is the new proposed Bolton Rd. that would be going north of the interchange that is under study. This proposed Bolton Rd. would be going north and end up at an intersection with N.A.Y.P. Rd. & Cook Rd. This is the property that I farm on. The location is in Steph Co., Harlan Township, Section 17. This proposed Bolton Rd. would divide my farm land up into 3 parcels. I have no problem with the two larger parcels of land. But the 3rd parcel of land, which is very small, like maybe less than an acre, would be worthless to me or anybody. Even turning a farm machine around in it or also couldn't even sell that small of a parcel for a building lot. The county zoning board told me that no building a house would ever. I am looking forward from hearing from you on this concern. I thank you for letting me express my concerns. L Roy Jensen

PLEASE PRINT
NAME: L Roy Jensen
ADDRESS: 3137 N.A.Y.P. Rd.
Lea, IL 61048
PHONE: (815) 563-4561

I (Do ☒ Do Not ☐
DESIRE A RESPONSE.
PLEASE SUBMIT WRITTEN
RESPONSE BY:

PLEASE PRINT
NAME: L Roy Jensen
ADDRESS: 3137 N.A.Y.P. Rd.
Lea, IL 61048
PHONE: (815) 563-4561

153

**NORTHWEST ILLINOIS
PRAIRIE ENTHUSIASTS**

11219 East Stockton Road, Stockton Illinois 61085
(815) 947-2287 lonetree@mwcl.net

July 20, 2003

Mr. Gregory L. Mounts, P. E.
District Engineer
Illinois Department of Transportation
819 Depot Avenue
Dixon, Illinois 61021-3500

Dear Mr. Mounts:

The Prairie Enthusiasts hereby submits the following comments on the Draft Environmental Impact Statement for U.S. Route 20 (FAP 301) from Illinois Route 84 North of Galena to Bolton Road Northwest of Freeport, in Jo Daviess and Stephenson Counties, Illinois.

The National Environmental Policy Act (NEPA) requires the government to identify to the public, in an Environmental Impact Statement (EIS), all relevant measures that can reasonably be used to avoid or reduce the adverse environmental impacts of a proposed government action.

This draft EIS (DEIS) fails to meet this NEPA requirement.

Air Pollution

This DEIS states that, "no mitigation measures are warranted to control vehicle emissions." However, it fails to mention, let alone analyze, the adverse effects on public health of the fine particulate matter emitted in vehicle exhaust.

Noise Pollution

This DEIS concludes that noise barriers are, "not considered reasonable or feasible." However, the only type of noise barrier considered is a 22 foot high fence. Other types of noise barriers, such as roadside landscaping or forest restoration, are not discussed.

The "acquisition of real property or interest therein to serve as a buffer zone" is identified in the DEIS as an appropriate way to mitigate highway noise. However, the applicability of this tool to this project is not considered.

Groundwater Pollution

This DEIS states that, "the proposed roadway will be susceptible to impacts from karst features present in underlying carbonate rocks," and also that, "Conditions most favorable for rapid downward movement to shallow aquifers...are not present in the project area." These conflicting statements leave the reviewer unable to determine what the impacts to groundwater will be.

154

155

Wetlands

This DEIS states that the preferred alternative will destroy 3.65 acres of wetlands. It proposes to mitigate this impact by recreating 21.48 acres of wetlands in a distant watershed.

For this project, mitigation in a distant watershed is not appropriate. Given the rarity of wetlands in the Driftless Area and the crucial ecological role they play, wetland mitigation for this project must be located within the local watershed.

The rationale for the 21.48 acre figure is missing.

Upland Forest

This DEIS states that the preferred alternative will destroy 273.5 acres of upland forest. It proposes to mitigate this impact by recreating 209.85 acres of trees.

The proposed ratio of 1 to 1.3 (restored to impacted acres) is insufficient. A ratio of at least 3 to 1 (restored to impacted acres) is required. Further, the ecological restoration of oak woodland habitat is the required action, not "reforestation," that is, the simple planting of trees.

Native Grassland

This DEIS states that the preferred alternative will destroy an acre of dolomite hill prairie. It proposes to mitigate this impact by recreating 10.4 acres of mesic tallgrass prairie.

This form of mitigation is misapplied. Dolomite hill prairie is a very rare and endangered ecosystem. The restoration of 10.4 acres of mesic tallgrass prairie does nothing to mitigate for its loss. Real and actual mitigation for this impact can only be approximated through the permanent protection of the 13.4 acres of dolomite hill prairie located within the study area.

The proposed 10.4 acres of mesic prairie restoration could mitigate for the loss of the other 2.9 acres of native grassland directly impacted by the proposed action.

Wildlife Corridors

This DEIS states that no "wildlife corridors" were identified within the project area. This statement is both misleading and irrelevant. NEPA does not allow the use of contrived language to avoid the analysis of real impacts.

A straightforward analysis would simply state that the entire length of the preferred alignment is rife with wildlife activities. Deer, coyote, fox, and turkey populations in Jo Daviess County are large and increasing. Other local species which utilize wildlife corridors include river otter, bobcat, badger, Bell's vireo, yellow-billed cuckoo, beaver, willow flycatcher, bald eagle, rattlesnake, tiger salamander, and several species of frog.

Further, the study area is just a few miles from the most important wildlife corridor on the continent, the Mississippi Flyway. Animal collisions are a common occurrence and are the most common type of accident reported for the existing roadway.

Terrain features identified as wildlife corridors (and which are directly impacted by the proposed action) include large contiguous patches of habitat, ridge tops acting as conduits between adjacent watersheds, and riparian zones acting as conduits within watersheds.

Developments identified as wildlife barriers (and which result from the proposed action) include habitat fragmentation, soil erosion, logging, direct obstructions such as fences and culverts, and the introduction of invasive species.

This DEIS states that the agency will, "attempt to eliminate some of the barriers created by the new road to wildlife movement." Attempts are insufficient. All types of barriers must be analyzed. Mitigation measures are necessary all along the preferred alignment, not just at a few selected locations.

Invasive Species

The DEIS states that, "The project is not expected to either introduce or increase invasive/nuisance species of plants." That would be a very surprising outcome.

A more reasoned approach would commit the agency to using only native plant materials in the construction and maintenance of this highway and to actively correcting all invasive/nuisance species problems as they arise.

Other Mitigation Tools

This DEIS makes no reference to commonly used mitigation tools such as conservation easements, landowners incentives, design waivers, agricultural easements, buffer zones, conservation plans, cooperative agreements, coordination with non-governmental organizations, or scenic easements.

IDOT may not wish to employ these tools for this project, but it may not arbitrarily exclude from its analysis such well established methods of avoiding or reducing the adverse environmental impacts of the proposed action.

Recommendations

Finally, The Prairie Enthusiasts would make the following general recommendations:

1. A formal public input process will be required to address and numerous and varied issues related to adverse environmental impacts that will arise during the design and implementation of this project. IDOT simply does not have all the answers.
2. Mitigation practices involving ecological restoration should be designed and implemented by a third party such as the Illinois Department of Natural Resources (IDNR). IDOT has neither the expertise nor the experience necessary to successfully complete this type of work.

This concludes our remarks on the DEIS for U.S. Route 20. Your timely attention to our comments and recommendations will be greatly appreciated.

Sincerely,



Jim Rachuy, Executive Director
Northwest Illinois Prairie Enthusiasts

2

3

NORTHWEST ILLINOIS
PRAIRIE ENTHUSIASTS

11219 East Stockton Road, Stockton Illinois 61085
(815) 947-2287 ionetree@mwci.net

July 20, 2003

Timothy W. Martin, Secretary
Illinois Department of Transportation
2300 South Dirksen Parkway
Springfield, IL 62764

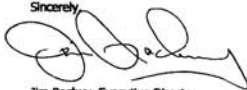
Dear Mr. Secretary:

The Board of Directors of the Northwest Illinois Prairie Enthusiasts hereby requests that the Illinois Department of Transportation create a formal, public input process for the detailed design and implementation of the Route 20 freeway project, Glacier Shadow Pass.

In our opinion this project will greatly benefit from a continuing discussion between your department and the citizens of Jo Daviess and Stephenson Counties. A formal venue, possibly like the very successful Route 20 Advisory Council, would help ensure that the design and implementation a new Route 20 continues to meet the high standards of both the Illinois Department of Transportation and the people of northwest Illinois.

Thank you for your timely and considerate attention to this very important matter.

Sincerely,



Jim Rachuy, Executive Director
Northwest Illinois Prairie Enthusiasts

Cc: Jim Getz, John Manzullo, Jim Sada, Todd Sieben



Illinois Department of Transportation
Division of Highways / District 2
819 Depot Avenue / Dixon, Illinois / 61021-3500
Telephone 815/284-2271

CITIZENS COMMENTS

FAP 301 (US 20)
SECTION 43-1,-2,-3,-4,-58177-1
JOB NO. P-92-004-92
JODAVIESS & STEPHENSON COUNTIES
GALENA TO FREEPORT EIS

- Why you did not consider Another 2 lane road somewhat parallel to existing Route 20. Similar to GALENA - East Dubuque Section?
- When you said that "Accident rate continue to climb" Please give me the figures of Accidents on Route 20 for the last 20 years, by year and location
- How much was the Average cost of one mile of Freeway of Freeway I-39?
- Why not build a Freeway by the Wisconsin border and make it continue I-43 to Dubuque?

I (Do ☒ Do Not ☐)
DESIRE A RESPONSE.
PLEASE SUBMIT WRITTEN
RESPONSE BY:

PLEASE PRINT
NAME: Darla Kehn-Villa
ADDRESS: 826 S. Rocky Hill Rd
GALENA IL 61036
PHONE: (815) 777 1950

RECEIVED
JUL 23 10 56 AM '03
ILLINOIS DEPARTMENT OF TRANSPORTATION

156



Illinois Department of Transportation
Division of Highways / District 2
819 Depot Avenue / Dixon, Illinois / 61021-3500
Telephone 815/284-2271

CITIZENS COMMENTS

FAP 301 (US 20)
SECTION 43-1, 2-3, 4-5&177-1
JOB NO. P-92-004-92
JO DAVIEN & STEPHENSON COUNTIES
GALENA TO FREEPORT EIS

- Why is it important to have a Freeway between Rockford to Wathtloo?
- How long has IDOT worked on this project? How much money has IDOT spent so far on this project? Why has this project taken so long?
- * When you said that "73% of existing highway 20 does not meet current design standards" please describe in detail the segments that consist the 73% starting in Galena and going towards Freeport.
- Is it true that some of the people working on this project spent their whole career working on "Glavin Shadow Pass" and are ready to retire? Please name them with titles.

I (Do ☒ Do Not ☐
DESIRE A RESPONSE.
PLEASE SUBMIT WRITTEN
RESPONSE BY:

NAME: Armando Villa
ADDRESS: 826 S. Rocky Hill Rd
Galeana IL 61036
PHONE: (815) 777 1234

157

2594 Royal Oaks Dr.
Freeport, IL 61032
July 21, 2003

Mr. Gregory L. Mounts
Dist. Engineer IDOT
819 Depot Ave.
Dixon, IL 61021-3500

Dear Mr. Mounts:

I have been following the issue of the proposed Freeway through Jo Davies County and am more convinced than ever that it should never be completed. It would be tragic to destroy the natural beauty of this area and create adverse environmental impacts that would be irreversible. Roads can be built in much less sensitive areas.

Sincerely,

Sandra Tune

Sandra Tune



159



Illinois Department of Transportation
Division of Highways / District 2
819 Depot Avenue / Dixon, Illinois / 61021-3500
Telephone 815/284-2271

CITIZENS COMMENTS

FAP 301 (US 20)
SECTION 43-1, 2-3, 4-5&177-1
JOB NO. P-92-004-92
JO DAVIEN & STEPHENSON COUNTIES
GALENA TO FREEPORT EIS

The current Interstate Route #20 that through Jo Davies County, IL, is more than adequate as well as scenic for the citizens/residents of the area as it exists.

If an Interstate Route #20 Commercial By-Pass West is proposed for the tri-state, expanding urban development area, it should be designed for the plateau terrain between Beloit, Wisc., and Dubuque, Iowa, crossing the Mississippi River by use of the 4-lane Dubuque, Wisconsin Bridge.

I (Do ☒ Do Not ☐
DESIRE A RESPONSE.
PLEASE SUBMIT WRITTEN
RESPONSE BY:

PLEASE PRINT
NAME: Barbara Kurtz Jones
ADDRESS: 270 N. Pilot Knob Rd
Galeana, IL 61036
PHONE: 815-777-8328

158

Davies County, IL by the year 2020 is huge. One only has to read the statistical information published and documented by FHWA, USDOT and AASHTO (Map & chart included from the AASHTO Bottom Line Report - 5 pages). These published figures are huge.

Based on the National Highway System being only 4 percent of our nation's highways, the results are staggering when multiplying 40 percent of our nation's highway traffic and 70 percent of our commercial truck traffic by only the statistics in the Freight Analysis Framework Freight News document dated October, 2002. Adding to this data International trade freight tonnage nearly doubling in volume by 2020 compounds the results. The amount of diesel emissions will be commensurately huge.

Returning now to the legislation hearing of March 2, 1995 to approve the National Highway System. The U.S. Department of Transportation Secretary Pena stated that

"On December 9, 1993, we submitted our proposed NHS map and a report describing the system to the Congress for review. This map was the culmination of several years work by States, local governments, metropolitan planning organizations, and the department to identify highways of national significance. These are the highways that will safely support our Nation's economic, national defense and mobility needs." (pg. 497)

"While ISTEA provided certain key routes like the interstate system be included in the NHS, the majority of the National Highway System was formulated from the ground up as we developed our proposals. This process was truly a grass-roots effort. We looked to State and local officials to identify these major roads because they know firsthand which routes best serve the many diverse transportation needs of the Nation." (pg. 497)

"This small fraction of our Nation's roads carries a large percentage of all personal and commercial highway traffic and ties America together by providing access to major ports, airports, rail stations, public transportation facilities, and international border crossings." (pg. 497)

U.S. 20 is recognized by USDOT and FHWA to play an important role in "this small fraction of our Nation's roads..." "These are the highways that will safely support our Nation's economic, national defense and mobility needs."

"With the designation of the NHS, we can channel needed improvements to these key highways, improving the efficiency and reliability of our entire transportation system." "But even with the increase in Intermodal transport in recent years, close to 85 percent of the Nation's freight tonnage still travels at least part of its journey over a highway." (pg. 498)

"The economic benefits of the National Highway System would not end at our Nation's borders. Most of the freight moving between the United States and Canada, our number one trading partner, and the United States and Mexico, recently our second largest trading partner, moves by truck. Now that the North American Free Trade Agreement (NAFTA) has been adopted and the largest free trade zone in the world created, trade is accelerating. The National Highway System will serve all major international border crossings and connects U.S. routes with the principal highways of Canada and Mexico, creating a high-performance system spanning most of North America." (pg. 498)

On the heels of the North American Free Trade Agreement having been adopted, this document states that "The National Highway System will serve all major international border crossings and connects U.S. Routes with the principal Highways of Canada and Mexico, ... etc."

Since the inception of ISTEA in 1991, it was known that in order for NAFTA to work as a viable economic trade agreement, the United States highway infrastructure would have to be upgraded to accommodate the increased volumes of freight traffic on U.S. highways, which would include over-sized diesel trucks some now 108" in width without length limits and 18 wheelers weighing between 80,000 to 100,000 pounds each. These trucks cause greater chemical emissions.

U.S. 20 as part of the NAFTA National Highway System is a NAFTA trade route east-west connector. Since all of the above information has not been disclosed to the citizens in Jo Davies



July 9, 2003

Mr. McCormick:

The Tourism Work Group, along with the other Advisory Council Work Groups involved in the Glacier Shadow Pass Study, unanimously chose the Long Hollow alternate as the preferred route for an upgrade of the Highway system through Jo Daviess and Stephenson Counties. However, it has been brought to our attention, that U.S. 20 is designated as an arterial link in the NAFTA Trade Corridor, a primary connecting link in the United States Department of Transportation NAFTA Highway and Superhighway System. This substantial information was not considered in the study. If U.S. 20 is designated a NAFTA route, the recommendations of that study would have been dramatically different.

The Tourism Work Group of the Advisory Council for the Illinois Department of Transportation hereby officially suspends its support for any of the proposed alignments for the four-lane U.S. 20 through Jo Daviess County, until the impact of the NAFTA connection can be fully studied. We request that the Environmental Impact Statement be modified to reflect this position.

We further contend that the Environmental Impact Statement (Draft, dated May 20, 2003) is inconclusive without the consideration of this information. Therefore it cannot be used to determine the viability, nor the location of a highway designed to serve the volume of traffic and amount of pollution that will be generated on a NAFTA link, through this, Illinois' #2 tourism destination, the highly environmentally sensitive driftless area.

By this letter, we formally request that the following documents supporting our decision be included in our response to the draft of the Environmental Impact Statement:

- A. Iowa U.S. 20 Corridor Association map (3 pgs.)
- B. Insert from the ISTEA document (1 pg.)
- C. Congressional Record of Speech by Sen. Kay Bailey Hutchison on the Senate Floor re: introduction of S. 1099, May 21, 2003 (1 pg.)
- D. Freight Analysis Framework article by USDOT re: freight volume and projections to the year 2020 (2 pgs.)
- E. Amendment to TEA-21 re: National Corridor Planning and Development, presented to the U.S. Senate May 21, 2003, by Sen. Kay Bailey Hutchison
- F. House Concurrent Resolution 16, Partial Bill History from the Legislature in the State of Iowa (2 pgs.)
- G. Tourism on-line Press Release: "Tourismers Join Lawsuit Over Median Truck Emissions" (1 pg.)

Since we, in the Tourism Work Group, have had no previous knowledge of the NAFTA connection, we formally request all pertinent information available to IDOT, and further request the opportunity to evaluate it's implications with IDOT and the other Work Groups involved in the Glacier Shadow Pass Study.

We look forward to a timely response from IDOT to these requests, and a meeting of the Advisory Council to address the information.

Kate Freeman
Kate Freeman, Chair
Tourism Workgroup

Tony Kemp
Tony Kemp, Rep
Tourism Workgroup

160



Home
Latest Developments
About U.S. 20
About the U.S. 20 Corridor
Newsletter
Photo Gallery
Connecting the Midwest
General Information
Links
Contact Us
Retreat Information
Support For U.S. 20
Membership

This map clearly shows the potential impact on the northern half of the State of Iowa as well as Illinois, Wisconsin, South Dakota and Nebraska. With approximately 73% of Iowa traffic moving east and west, completion of U.S. 20 will give Iowa its second state-wide 4-lane highway to help accommodate this traffic flow. This will also relieve the congestion and unsafe conditions of I-80.

Dubuque is a tri-state hub for Iowa, Wisconsin, and Illinois and Sioux City is a tri-state hub for Iowa, Nebraska, and South Dakota - both gateways to the state of Iowa on U.S. Highway 20.

Wisconsin is nearing completion of Hwy. 151 (northeast of Dubuque, Iowa) between Dodgeville and Dickeyville to reach the Madison area and enable a better transportation route for their products.

Illinois is progressing on planning and construction of their section of Highway 20 between Galena and Freeport thus reaching the Chicago area and beyond.

On the western side of Iowa, Nebraska is proceeding on their Hwy. 35 from Sioux City southwest to Norfolk.

<http://pionet.net/~setd/hwy20/connect.html>

6/21/2003



US 20 Environmental Corridor

Home
Latest Developments
About U.S. 20
About the U.S. 20 Corridor
Newsletter
Photo Gallery
Connecting the Midwest
General Information
Links
Contact Us
Retreat Information
Support For U.S. 20
Membership

- The US 20 Corridor Association has been working on this project since the 1960's. The legislators along the corridor have set US 20 as their number one priority.
- The corridor is almost finished with less than 92 miles of this vital transportation link to complete. The gap left to complete is from Sioux City to Fort Dodge which would greatly enhance the transportation network for thousands of businesses.
- This project would be leading the nation in completing a corridor that showcases native plantings including recreation and tourism which appears to be the Governor's and the Legislature's priority, as well as enhancing and promoting economic development.
- The Corridor Association is composed of counties outside the immediate corridor area.
- A four lane US 20 would provide a desperately needed east-west alternative to the overcrowded and dangerous I-80. This would also cut miles from the average trucker's route resulting in lower freight costs and speedier delivery.
- US 20 cuts Iowa in 1/2 between I-80 and I-90 north of the Minnesota border.
- US 20 will be a direct route to NAFTA without traveling through any mix masters or urban areas.
- It's been proven by economic development officials that prospective businesses are interested in the nearest Interstate or 4-lane highway. As evidence of this, note the way the state has grown next to these transportation enhancements in the eastern portion of the state.
- According to Vlasack's Iowa 2010 Strategic Plan - one of the actions identified was to achieve the development of the environmental corridor comprehensive plan for US 20 from Dubuque to Sioux City.
- The Environmental Highway concept has gained great momentum as people realize that this corridor can serve not only as a transportation network but a tourism draw by highlighting our natural resources.
- The states bordering Iowa are working on highway improvement projects to connect with this corridor. Improvements are planned from Nebraska and Illinois to Wisconsin to tie to US 20.
- The corridor would be of great benefit to our agricultural industries. New ethanol plants being built near Galva and Cleghorn will need a network worthy of providing them with raw product as well as trucking the finished product. 50% of the Northwest Iowa billion dollar corn and soybean crop is shipped by truck.
- The US 20 Corridor Association is a coalition of many groups: City and county officials, economic developers, Councils of Government, Chambers of Commerce, County Conservation Boards, DNR, DOT, Trees Forever, Iowa State University Department of Landscape Architects, University of Northern Iowa, trucking firms, industries and retail businesses, as well as interested citizens.

TOP

NOTE: The Newsletter, Membership, Contact Us, and Retreat Information sections are printable documents in the Adot Acrobat format and they will open in a new window. When you are finished with those pages, just close them to return here.

<http://pionet.net/~setd/hwy20/corridor.html>

I-26 runs north from Sioux City into South Dakota and northward to Canada or connects to I-90 to run westward to the Pacific.

Iowa must now complete the 90-mile portion of U.S. 20 between Fort Dodge and Moulville just east of Sioux City. We must complete the "Midwest Connector" for regional economic growth by enhancing the flow of traffic within and through Iowa.

"If transportation is referred to as the engine that drives the economy, then we must keep our engine fueled and running in the right direction to complete this project of making U.S. Highway 20 a 4-lane highway," said V.H. "Buck" Boekelman of Fort Dodge.

NOTE: The Newsletter, Membership, Contact Us, and Retreat Information sections are printable documents in the Adot Acrobat format and they will open in a new window. When you are finished with those pages, just close them to return here.

Intermodal Surface Transportation Efficiency Act of 1991	27
Intermodal Surface Transportation Efficiency Act of 1991	28
TITLE V - INTERMODAL TRANSPORTATION	31
TITLE VI - RESEARCH, STUDIES, AND ACTIVITIES	31
PART A - PROGRAMS, STUDIES, AND ACTIVITIES	31
Research and Technology	31
International Highway Transportation Outreach Program	32
Bureau of Transportation Statistics	32
National Transit Institute	32
University Transportation Centers/Research Institutes	33
PART B - INTELLIGENT VEHICLE-HIGHWAY SYSTEMS (IVHS)	33
PART C - ADVANCED TRANSPORTATION SYSTEMS AND ELECTRIC VEHICLES	34
TITLE VII - AIR TRANSPORTATION	35
TITLE VIII - EXTENSION OF HIGHWAY-RELATED TAXES AND HIGHWAY TRUST FUND	37
TABLES	
1 - Authorizations	38-39
2 - Federal Share and Availability for Significant Programs	40-41
	42

Intermodal Surface Transportation Efficiency Act of 1991

On December 18, 1991, the President signed the Intermodal Surface Transportation Efficiency Act of 1991 providing authorizations for highways, highway safety, and mass transportation for the next 6 years. Total funding of about \$155 billion will be available in fiscal years (FY) 1992-1997. (See authorization table on pages 38-41 for a summary of funding by program.)

The purpose of the Act is clearly enunciated in its statement of policy:

"To develop a National Intermodal Transportation System that is economically efficient, environmentally sound, provides the foundation for the Nation to compete in the global economy and will move people and goods in an energy efficient manner"

The provisions of the Act reflect these important policy goals. Some of the major features include:

<http://ntl.bts.gov/DOCS/sta.html>

6/23/2003



Congressional Record

PROCEEDINGS AND DEBATES OF THE 108TH CONGRESS, FIRST SESSION

Senate Floor Speech
Senator Kay Bailey Hutchison
May 21, 2003 - Page: S8863

INTRODUCTION OF S. 2050

MRS. HUTCHISON. Mr. President, for the past 50 years U.S. transportation policy has focused on building a system designed to meet the needs of a rapidly growing population that was still expanding westward. Today, I am pleased to introduce legislation that will ease congestion brought on by the North American Free Trade Agreement, NAFTA, by reforming the Coordinate Border Infrastructure Program and the National Corridor Planning and Development Program. These two programs are commonly known, collectively, as the Border and Corridor program.

Thanks to NAFTA, more of our trade crosses international borders, and 80 percent of that trade moves into and through the United States in trucks. Since the passage of NAFTA in 1993, traffic on America's trade corridors has doubled. Although this commerce has been a boon to the Nation's economy, it has been devastating to some of the country's infrastructure. With almost 80 percent of the NAFTA trade traveling through my home State of Texas, the increased volume has further congested and worn out our major highways including I-35, and created the need for new highways like I-69 and Ports-To-Plains. The loss of productivity resulting from increased time spent in traffic, and the declining condition of critical international corridors will have the long term effect of diminishing the economic benefits of NAFTA trade. It is also forcing border States to bear an unfair portion of the infrastructure cost.

In TEA-21, Congress created the Border and Corridor program, intending to address the infrastructure needs generated by NAFTA trade. Unfortunately, funding for these discretionary programs has often been misdirected to non-border states and corridors lacking international significance.

The Border and Corridor programs provide funds for projects on the border to speed international crossings, and to provide resources to High Priority Corridors that experience increased NAFTA truck traffic. With almost every state in the country having a designated High Priority Corridor, the limited funding was insufficient to provide any real benefit where it is most needed. My legislation will reaffirm that only those corridors that are carrying the burden on NAFTA trade are eligible to receive funding.

Both programs are important to the goal of addressing infrastructure needs resulting from NAFTA trade traffic. However, the two programs do not always receive equal funding. My legislation will guarantee that the Coordinated Border Infrastructure Program will receive 50 percent of the available funding, to ensure that border regions will have the resources to conduct truck and bus inspections, and inspect commercial vehicles rapidly enough to keep traffic moving at the border.

As Congress considers TEA-21 reauthorization, I will be dedicated to shifting the federal focus on programs that can address the critical need of states that have been impacted by NAFTA trade traffic. I want to thank my cosponsors, including Senators Domenici, Bingaman, Kyl, and Cornyn for recognizing the importance of restoring fairness to these critical highway programs.

<http://hutchison.senate.gov/spec323.htm>

6/27/2003



The Freight Analysis Framework

The U.S. Department of Transportation (USDOT) recognizes that the smooth flow of freight in the United States and across its borders is important to our nation's economy. In recent years, increases in the volume of freight have strained the transportation network in some locations and exacerbated conflicts between the traveling public and freight carriers. Growing international trade has also changed the geography of freight movements within the United States, placing greater pressure on gateways, ports, and border crossings—nodes in the system that are potential bottlenecks for the movement of freight.

Understanding future freight activity is important for matching infrastructure supply to demand and for assessing investment and operational strategies. To help decisionmakers identify areas in need of capacity improvements, USDOT created the Freight Analysis Framework (FAF), a comprehensive database and policy analysis tool, to examine geographic relationships between freight movement and infrastructure capacity. FAF was developed from several private and government databases, including the Bureau of Transportation's Commodity Flow Survey.

FAF provides detailed information on freight flows for the truck, rail, water, and air modes and for various commodities. It also forecasts freight activities for 2010 and 2020.

Key Findings

- The U.S. transportation system carried over 15 billion tons of freight valued at over \$9 trillion in 1998. Domestic freight movements accounted for nearly \$8 trillion of the total value of shipments. By 2020, the U.S. transportation system is expected to handle cargo valued at nearly \$30 trillion. (Maps showing major freight flows for various modes are shown on the reverse.)
- The nation's highway system, and our enormous truck fleet, moved 71 percent of the total tonnage and 80 percent of the total value of U.S. shipments in 1998. Although trucks made the vast majority of local deliveries, they also carried large volumes of freight between regional and national markets. Water and rail also moved significant shares of total tonnage, but they accounted for much smaller shares when measured on a value basis. As expected, air freight moved less than 1 percent of total tonnage but carried 12 percent of the total value of shipments in 1998.
- Domestic freight volumes will grow by more than 65 percent, increasing from 13.5 billion tons in 1998 to 22.5 billion tons in 2020. The forecast shows that the air and truck modes will experience the fastest growth. Domestic air cargo tonnage is projected to nearly triple

Figure 1. Freight Flows by Truck: 1998 (tons)



Figure 2. Freight Flows by Truck: 2020 (tons)



Figure 3. Freight Flows by Rail: 1998 (tons)

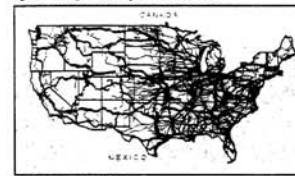
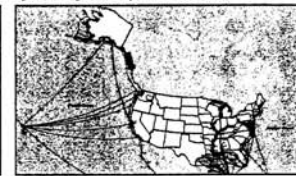


Figure 4. Freight Flows by Water: 1998 (tons)



over this period, although its share of total tonnage is expected to remain small. Trucks are expected to move over 75 percent more tons in 2020, capturing a somewhat larger share of total tonnage. While volumes moved by the rail and domestic water modes are also projected to increase over the forecast period, they will not grow as dramatically primarily because of anticipated slower growth in demand for many of the key commodities carried by these modes.

- International trade accounted for 12 percent of total U.S. freight tonnage in 1998 and is forecast to grow faster than domestic trade. International trade is projected to increase by 2.8 percent annually between 1998 and 2020, nearly doubling in volume. This growth in international trade is likely to present challenges to U.S. ports and border gateways.

FAF Products

A series of FAF products are available on the Office of Freight Management and Operations website noted below. Some examples of FAF outputs include freight flow maps for states, modes, and gateways; detailed databases on traffic flows and commodity movements; information on the methodologies used to develop FAF; and forecast assumptions. An online freight dialogue on freight data has also been established on the website.

For More Information, Please Contact
Bruce Lambert
Office of Freight Management and Operations
Federal Highway Administration
(202) 366-5241
bruce.lambert@fhwa.dot.gov

Table 1. U.S. Freight Shipments by Tons and Value

Mode	Tons (million)			Value (Billion \$)		
	1998	2010	2020	1998	2010	2020
Domestic	9	18	25	545	1,308	2,246
	10,439	14,930	18,130	6,656	12,746	20,241
	1,954	2,528	2,854	530	848	1,230
	1,082	1,345	1,487	146	250	358
	13,464	18,828	22,557	7,876	15,152	24,075
International	9	16	24	538	1,198	2,284
	419	753	1,069	772	1,724	3,131
	358	518	699	116	248	432
	136	199	260	17	34	57
	864	1,090	1,259	NA	NA	NA
	1,787	2,556	3,311	1,444	3,203	5,904
TOTAL	15,271	21,376	25,848	9,320	18,355	29,980

Key: NA=Not Available. Note: Model numbers may not add to totals due to rounding.

*Other includes international shipments that moved via pipeline or by an unspecified mode.

October 2002
FHWA-OP-05-006
EIS-13694

Office of Freight Management and Operations, 400 7th Street, SW, Room 3401, Washington, D.C. 20590
<http://www.ops.fhwa.dot.gov/freight>, Toll-free help-line 866-367-7487



U.S. Department of Transportation
Federal Highway Administration

To amend the Transportation Equity Act for the 21st Century with respect to national corridor planning and development and coordinated border infrastructure and safety.

IN THE SENATE OF THE UNITED STATES

MAY 21, 2003

Mrs. HUTCHISON (for herself, Mr. DOMENICI, Mr. BINGAMAN, Mr. KYL, and Mr. CORNYN) introduced the following bill; which was read twice and referred to the Committee on Environment and Public Works

To amend the Transportation Equity Act for the 21st Century with respect to national corridor planning and development and coordinated border infrastructure and safety.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. NAFTA CORRIDOR PLANNING AND DEVELOPMENT.

(a) IN GENERAL.—Section 1118 of the Transportation Equity Act for the 21st Century (23 U.S.C. 101 note) is amended—

(1) by inserting “The Secretary shall provide consideration to corridors where traffic has in-

(1) SECTION HEADING.—Section 1118 of the Act is amended by striking “NATIONAL” in the section heading and inserting “NAFTA”.

(2) TABLE OF CONTENTS.—Section 1(b) of that Act is amended by striking the item relating to section 1118 and inserting the following:

“Sec. 1118. NAFTA corridor planning and development program.”.

SEC. 2. COORDINATED BORDER INFRASTRUCTURE.

(a) IN GENERAL.—Section 1101(a)(9) is amended by striking “2003.” and inserting “2003, and such sums as may be necessary for each of fiscal years 2004 through 2009.”.

Section 1119 of the Transportation Equity Act for the 21st Century (23 U.S.C. 101 note) is amended—

(1) by striking subsection (d) and redesignating subsection (e) as subsection (d); and

(2) by adding at the end the following:

“(e) FUNDING.—Fifty percent of the funds made available by section 1101 of this Act to carry out section 1118 and this section for each of fiscal years 2004 through 2009 shall be—

“(1) available for obligation to carry out this section; and

“(2) made available for obligation in the same manner as if such funds were apportioned under chapter 1 of title 23, United States Code.”.

enacted since the date of enactment of the North American Free Trade Agreement Implementation Act and is projected to increase in the future.” in subsection (a) after “trade.”;

(2) by striking subsection (b) and inserting the following:

“(h) ELIGIBILITY OF CORRIDORS.—The Secretary may make allocations under this section with respect to high priority corridors identified in section 1105(e) of the Intermodal Surface Transportation Efficiency Act of 1991 that connect to the border between the United States and Mexico or the United States and Canada.”.

(3) by striking “and section 1119” in subsection (e); and

(4) by adding at the end the following:

“(h) FUNDING.—Fifty percent of the funds made available by section 1101 of this Act to carry out section 1119 and this section for each of fiscal years 2004 through 2009 shall be—

“(1) available for obligation to carry out this section; and

“(2) made available for obligation in the same manner as if such funds were apportioned under chapter 1 of title 23, United States Code.”.

(b) CONFORMING AMENDMENTS.—

Text: [HCR0000](#) Text: [HCR0000](#)
Text: [HCR0000](#) Text: [HCR0000](#)
Bills and Amendments: [General Index](#) Bill History: [General Index](#)
[Get Version To Print](#)

This file contains UNDERSCORE. If you cannot see the UNDERSCORE attribute or would like to change how this attribute is displayed, please use the following [form](#) to make the desired change.

House Concurrent Resolution 16

Partial Bill History

- Resolution Filed: [H.J. 466](#)
- Complete Bill History

Bill Text

PAG LIN
1 1 HOUSE CONCURRENT RESOLUTION NO.
2 2 BY FREEMAN, MILLER, MURPHY, WENDT, WHITEHEAD, MERTZ,
3 3 KURN, D. TAYLOR, SHOULTZ, OSTERHAUS, JOCHUM,
4 4 THOMAS, BERRY, FORD, MYERS, TIEPKES, RASMUSSEN,
5 5 ROSEMAN, CHAMBERS, ALONS, HOFFMAN, GRANZOW,
6 6 ROBERTS, TYMESON, FREVERT, RAYMONS, LUKAN,
7 7 MANTERNACH, DENNIS, D. HANSON, EICHORN, KLEMME,
8 8 RANTS, UPMEYER, JENKINS, SCHICKEL, DIX, and GIFF
9 9 A Concurrent Resolution supporting the completion of
10 10 U.S. Highway 20 across northern Iowa and requesting
11 11 federal assistance.
12 12 WHEREAS, the Iowa General Assembly finds that a
13 critical need exists to complete U.S. Highway 20 as a
14 four-lane, high priority corridor across the state of
15 Iowa; and
16 WHEREAS, the road known as U.S. Highway 20 was one
17 of the first coast-to-coast highways in the United
18 States, beginning in downtown Boston and continuing
19 across the country to the Pacific Coast in Oregon; and
20 WHEREAS, U.S. Highway 20 connects all north-south
21 interstates in Iowa and is an arterial link to the
22 North American Free Trade Act (NAFTA) corridor; and
23 WHEREAS, Iowa has three north-south interstate
24 highways, but only one east-west interstate highway,
25 and the distance from northwest Iowa to Chicago via
26 Interstate 80 is approximately 100 miles farther than
27 the distance via U.S. Highway 20; and
28 WHEREAS, most northwest Iowa businesses and farms
29 are located 60 to 90 miles from a four-lane highway,
30 limiting the region's potential for economic growth;
31 and
32 WHEREAS, an estimated 50 percent of the millions of

2 3 bushels of corn and soybeans grown in the region are
 2 4 shipped out of northwest Iowa by truck; and
 2 5 WHEREAS, more than 6,500 businesses are located in
 2 6 the 10 Iowa counties along the U.S. Highway 20
 2 7 corridor, and of the 109 Iowa companies with 1,000 or
 2 8 more employees, 30 are located or have a presence in
 2 9 those counties; and
 2 10 WHEREAS, more than 11,000 businesses are located in
 2 11 the 19 Iowa counties that U.S. Highway 20 serves as an
 2 12 arterial highway connecting to Interstate 29 and
 2 13 Interstate 35; and
 2 14 WHEREAS, the environmentally friendly bridge built
 2 15 over the Iowa river near Iowa Falls at a cost of \$20
 2 16 million demonstrates the corridor's promise as a
 2 17 showcase for Iowa's natural beauty; and
 2 18 WHEREAS, the estimated cost to complete the
 2 19 construction of U.S. Highway 20 as a four-lane highway
 2 20 from Fort Dodge, Iowa, to Merville, Iowa, is \$450
 2 21 million; and
 2 22 WHEREAS, the completion of U.S. Highway 20 as a
 2 23 high priority, east-west corridor is a good investment
 2 24 for all of Iowa and the nation; NOW THEREFORE,
 2 25 BE IT RESOLVED BY THE HOUSE OF REPRESENTATIVES, THE
 2 26 SENATE CONCURRING, That the Iowa General Assembly
 2 27 supports the completion of U.S. Highway 20 as a high
 2 28 priority corridor across the northern half of Iowa;
 2 29 and
 2 30 BE IT FURTHER RESOLVED, That the Iowa General
 3 1 Assembly supports inclusion of U.S. Highway 20 as a
 3 2 high priority corridor in the upcoming reauthorization
 3 3 of the federal Transportation Equity Act for the 21st
 3 4 Century and in the federal appropriation request by
 3 5 the State Department of Transportation for fiscal year
 3 6 2004; and
 3 7 BE IT FURTHER RESOLVED, That a copy of this
 3 8 Resolution be sent to the Director of the United
 3 9 States Department of Transportation, the Director of
 3 10 the State Department of Transportation, and to the
 3 11 members of Iowa's congressional delegation.
 3 12 LSB 2395HH 80
 3 13 dea/cf/24

Press Release

[HOME](#)
[ABOUT IRT](#)
[PRESIDENT HOFFA](#)
[SEC. TREASURER KEEGEL](#)
[SEARCH](#)
[JOIN IRT](#)
[DIVISIONS](#)
[DEPARTMENTS](#)

TEAMSTERS ONLINE

[Teamsters Home](#)
[Teamsters About Us](#)
[Teamsters News](#)



Teamsters Join Lawsuit Over Mexican Truck Emissions

Press Release
 Headline News
Lawsuit by Environmental, Industry and Labor Groups Shows New Health Risks
May 1, 2002

(Washington, D.C.) – The International Brotherhood of Teamsters today joined a lawsuit over the Bush Administration's failure to address environmental health concerns with Mexican truck emissions. A coalition of environmental, labor and industry groups took the legal action to prevent the White House from allowing commercial Mexican trucks complete access to U.S. highways. The plaintiffs are seeking an emergency injunction to prevent the proposed federal regulations from becoming effective on May 3, 2002.

"Trucks that cross our border from Mexico must meet U.S. emissions standards," said James P. Hoffa, Teamsters General President. "Unless these standards are met, we should not allow these trucks to further pollute the air we breathe."

Currently, Mexico does not have strict controls on diesel emissions. Mexico-domiciled diesel trucks have already dramatically increased air pollution in the western border states. Diesel and its component chemicals have been linked to cancer, birth defects and asthma.

The groups filing suit are also seeking an injunction requiring the Bush Administration to conduct an Environmental Impact Statement so that significant public health concerns about these trucks can be fully addressed before they are allowed throughout the country.

Not only do Mexican trucks not have the same emissions controls, they do not use comparable fuels. This results in the emission of significantly greater quantities of harmful air pollutants. Moreover, the disparity will widen considerably in 2007 when U.S. trucks will be required to comply with more rigorous emissions standards and to begin using ultra-low sulfur diesel fuel.

Text: HCR00013
 Text: HCR00000 - HCR00099
 Bills and Amendments: [General Index](#)
 Text: HCR00017
 Text: HCR Index
 Bill History: [General Index](#)



<http://www.legis.state.ia.us/GA/80GA/Legislation/HCR/00000/HCR00016/Current.html> 6/29/2003

http://www.teamster.org/02news/nr_020501_1.htm

6/27/2003

**Comments of the
 Freeway Watch Committee, Inc.
 On the Draft Environmental Impact Statement
 For U.S. Route 20 (FAP 301)
 From Illinois Route 84 North of Galena
 To Bolton Road Northwest of Freeport in
 Jo Daviess and Stephenson Counties, Illinois
 Draft
 Environmental Impact Statement**

Contact:

Glyn Evans, President
 Freeway Watch Committee, Inc.
 3436 West Long Hollow Road
 Elizabeth, Illinois 61028
 Phone: 815-858-3482

Date: July 16, 2003

Introduction

Before government agencies can undertake a project with such wide ranging consequences as the construction of a freeway, the National Environmental Policy Act (NEPA) requires all consequences of the proposed action to be disclosed to the public in an Environmental Impact Statement (EIS). This document is required to present and contrast the varied impacts of the proposed action, the impacts of alternatives to the proposed action, and the impacts of not performing the proposed action.

The draft EIS (DEIS) for U.S. Route 20 (FAP 301) fails to fulfill these essential functions. It fails to consider all obvious and reasonable alternatives to the proposed action. It fails to adequately present a no-build alternative. It fails to uniformly and fairly contrast the impacts of the alternatives it does consider, and it derives several of its important conclusions from unsupported assumptions.

1. Induced Impacts

Jo Daviess County is largely pastoral and rural in character. By far the most significant business activities are agriculture and tourism. By increasing access to this area, a new freeway will induce development and thereby transform this community into a very different place from what it is today and from what it would become without the construction of a freeway. This expectation is well understood and amply supported by experience, expert opinion, and common sense.

NEPA requires an EIS to address the indirect effects of alternatives, including effects related to induced changes in the pattern of land use, population density and growth rate. When a freeway is planned for a largely rural area, such as FAP 301, the EIS must examine all of the impacts of development induced by the construction and operation of that facility.

This DEIS states that, "the selected alternative will function as a component of the natural landscape." No one believes that.

This DEIS does not present the impacts of this socio-economic transformation. It makes no attempt to contrast these impacts for alternatives to the proposed action, including the alternative of not building the new highway at all. Beyond the unsupported assumption that the socio-economic consequences of a freeway will occur even if one is not built, this DEIS provides no analysis of any kind that describes what Jo Daviess County would be like without a freeway.

Consequently, this DEIS fails to meet NEPA requirements.

2. No-Build Analysis

NEPA requires an EIS to analyze and present a "no-build" alternative, that is, the consequences of not performing the proposed action. This no-build analysis provides a critical benchmark enabling the public to compare the magnitude of the impacts for the build alternatives. Without this analysis, stakeholders cannot fairly judge the impacts of the build alternatives nor clearly choose between them.

This DEIS does not present a no-build analysis. Consequently, this DEIS fails to meet NEPA requirements.

During its deliberations, the Route 20 Advisory Consult was repeatedly advised by Illinois Department of Transportation (IDOT) consultants to not even discuss a no-build option. This clearly demonstrates intent to discourage public review of a no-build alternative.

3. Purpose and Need

An EIS must include a statement of "Purpose and Need," that is, a clear description of why the proposed action is being considered. This statement serves as the basis for selecting the set of alternatives to be studied. However, a narrowly drawn purpose and need cannot be used to preclude reasonable alternatives to the proposed action. NEPA does not allow agencies to fulfill their own prophecies in this manner.

This DEIS states that (1) most of existing U.S. Route 20 does not meet current design standards (a situation they assume needs to be corrected) and (2) the rough terrain of Jo Daviess County prohibits construction of a new highway along the existing alignment (for which they assume no design waivers should be requested).

Given this set of narrowly drawn assumptions there is no surprise the preferred alternative would build a new highway on a new alignment. Indeed, reasonable alternatives to the proposed action are precluded by this self-fulfilling purpose and need.

This DEIS uses its narrowly drawn purpose and need to dismiss out of hand otherwise reasonable alternatives. Consequently, it fails to meet NEPA requirements.

4. No-Build Alternative

To construct an alternative based on "no action at all" would be a useless academic exercise. NEPA requires a no-build alternative that reflects a continuation of the present course of action until such time as that action is changed. Consequently, projected impacts of build alternatives may be compared to those impacts projected for existing plans.

This DEIS defines the no-build alternative as "the existing local road with only normal maintenance and repair." This assumes the nonexistence of any current IDOT plans for improving the existing alignment which is patently false. Major improvements to the existing roadway are proceeding at this time. Further, IDOT publicly professes to be ready and willing to proceed with additional improvements.

Consequently, this DEIS fails to meet NEPA requirements.

5. Analysis of Fine Particle Emissions

Scientific studies have demonstrated the adverse health effects of fine particle emissions. Fine particles substantially increase the risk of pulmonary disease and human mortality. As a consequence, the United States Environmental Protection Agency (USEPA) has proposed stricter clean air and diesel engine standards for these emissions.

The proposed action would likely raise fine particle emissions levels in Jo Daviess County. That is, automobile and truck exhaust contains these particles and traffic will increase as a result of the proposed action. Further, FAP 301 has been designated a NAFTA trade corridor for use by international truck traffic which is a primary source of these contaminants.

This DEIS fails to mention, let alone analyze, the impacts of construction and operation of FAP 301 on fine particle emission levels. Consequently, this DEIS fails to meet NEPA requirements.

3

Consultants were used in the preparation of this DEIS. Consultants were also used to collect data and prepare plans for use in this DEIS. Nevertheless, no consultant disclosure statements are presented.

Consequently, this DEIS fails to meet NEPA requirements.

9. Indirect Impacts

An EIS is required by NEPA to identify the indirect impacts that are known for all alternatives and make a good faith effort to explain effects that are not known but reasonably foreseeable. The acting agency has the responsibility to make an informed judgment and to estimate future impacts on that basis. The agency cannot ignore the uncertain but probable effects of its decisions.

U.S. Route 20 has been designated a NAFTA trade corridor. Indirect impacts resulting from this designation are likely to be substantial and to effect human health. Nonetheless, these impacts are not mentioned, let alone analyzed, in this DEIS.

Consequently, this DEIS fails to meet NEPA requirements.

It is the position of FWC that due to the agency's failure to fully disclose the designation of the proposed freeway as part of the NAFTA superhighway system and their failure to address the resulting environmental consequences, this DEIS cannot provide a basis for funding this project.

10. Design Waivers

NEPA requires all relevant, reasonable measures that avoid or reduce the adverse impacts of the proposed action to be identified, including remedies outside the jurisdiction of the acting agency. Such analysis is necessary to inform the government and the public as intended by NEPA.

Nevertheless, IDOT has publicly stated that design waivers for FAP 301 will not be requested. The use of waivers, a well established practice in many jurisdictions, are thereby dismissed out of hand as a means to avoid or reduce adverse impacts. Consequently, this DEIS fails to meet NEPA requirements.

In this DEIS, IDOT uses the consequences of its own refusal to seek waivers as a justification for dismissing otherwise reasonable alternatives to the proposed action.

Consequently, this DEIS again fails to meet NEPA requirements.

11. No Known Opposition

This DEIS states, "At this time, there are no known local or agency-related subjects of controversy or unresolved issues associated with the proposed project." To the contrary, active and ongoing opposition to the construction of a freeway in Jo Daviess County has existed for over a decade.

In August of 1993, the Freeway Watch Committee (FWC) was formed for the express purpose of organizing this opposition. Incorporated as a not-for-profit corporation in April of 1995, FWC has to this day remained a strong advocate for a safe, economical expressway, constructed substantially on the existing U.S. Route 20 alignment. FWC is dedicated to continuing an open and comprehensive discussion of the issues surrounding this project until they can be fairly resolved.

5

6. Alternatives to the Proposed Action

An EIS must examine all reasonable alternatives to the proposed action. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the acting agency likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the agency.

This DEIS does not consider the reasonable alternative of locating this highway in the much simpler terrain of southwestern Wisconsin rather than cutting through the steep valleys of northwestern Illinois. IDOT can prefer to construct a facility in Illinois, but cannot exclude this very reasonable alternative from its analysis.

Likewise, this DEIS does not consider a "Super Two" alternative, that is, a two-lane design with wide shoulders, turning lanes, passing lanes every five miles, and bypasses around smaller towns. This despite studies which show Super Twos serve rural areas as well as traditional four-lane designs with dramatically reduced costs and adverse environmental impacts.

Likewise, this DEIS rejects the most obvious alternative of locating a new highway on the existing Route 20 alignment, such as proposed by the Freeway Watch Committee (FWC) in October of 1996. IDOT can say it does not want to do this, but it cannot exclude this very reasonable alternative from its analysis. Such an alternative would again be far less costly than the preferred alternative.

Consequently, this DEIS fails to meet NEPA requirements.

The FWC design for a Route 20 expressway on the existing alignment, entitled *Recommendations For The Expressway Alternative For U.S. 20*, is here attached and fully included as an integral part of these comments.

7. Environmentally Preferable Alternatives

NEPA requires that all alternatives that were considered to be environmentally preferable to the proposed action be identified. This means the alternatives that cause less damage to the biological and physical environment and which better protect historic, cultural, and natural resources.

The acting agency is encouraged by the Council on Environmental Quality to identify environmentally preferable alternatives in the DEIS. In all cases, the agency must identify all environmentally preferable alternatives in a Record of Decision (ROD).

Although the preferred alternative is clearly not an environmentally preferable alternative for this DEIS, this remains unstated. This omission only serves to obscure the facts and limit meaningful review. The final EIS (FEIS) for FAP 301 must clearly identify all environmentally preferable alternatives.

8. Disclosure Statements

NEPA requires that a consulting firm hired to prepare an EIS must execute a disclosure statement which reveals any financial or other interest it may have in the outcome of the project, that is, any known benefits other than general enhancement of professional reputation. When a consulting firm has been involved in developing data or plans for a project, disclosure statements must also state the scope and extent of the firm's prior involvement in order to expose any potential conflicts of interest.

4

Other organizations that expressed reservations with the proposed action include The Sierra Club, Northwest Illinois Audubon Society, Deloupe Audubon Society, Natural Land Institute, Jo Daviess Conservation Foundation, and the Galena Territory Landowners Association.

Even the Route 20 Advisory Council, in its recommendations, was commenting only on the set of alternatives presented to them by IDOT, and which did not include the required no-build alternative.

12. Analysis of Accident Data

This DEIS states, "crash data has been reviewed for a period covering 1984 thorough [sic] 1999." Data for the years 1996, 2000, 2001, and 2002 appear to be missing.

This DEIS states, "this data [for 1997-1999] has not been analyzed, as the total number of crashes and types have continued to exhibit the same trends as the years previously analyzed." But no trend statistics are given. Trends may exist in this data, but they must be supported with calculation not assumed.

The DEIS states, "U.S. Route 20's history of relatively high crash rates is indicative of substandard roadway geometry." High compared to what? Substandard compared to what? No comparison data is provided.

The DEIS states, "The number of high crash locations along U.S. Route 20...has been higher for the 3-year period from 1989 to 1991 than for highways in the State as a whole." What locations? What state data? Was this true during other time periods? Again, conclusions are presented without any support.

The accident data presented in this DEIS are outdated, incomplete, and likely to be unrepresentative given the recent structural improvements to the existing roadway. The analysis of accident data presented in this DEIS is admittedly incomplete, rudimentary, and at best speculative.

Consequently, this DEIS does not meet NEPA requirements.

Given the inadequacies of the discussion on accident data in the DEIS (and in spite of the limits of the presented data) reviewers have no choice but to venture a few simple observations.

For example, during the decade of the 1990's, the number of traffic accidents per year dropped 12 percent (from 242 to 214). During this same period, traffic injuries dropped 37 percent (from 143 to 90). This apparent trend could be the result of recent improvements to the existing roadway, but the data presented is too thin and too old to know for sure.

Support for this DEIS assertion that there is a need for the proposed action due to safety is nonexistent. No projections for traffic accidents or injuries are provided for the preferred alternative. None are provided for the no-build alternative. None are provided for any alternative.

Consequently, this DEIS does not meet NEPA requirements.

July, 2003
Elizabeth, Illinois

6